

EPA Region 5 Records Ctr.



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**SITE ASSESSMENT REPORT
FOR THE
VENTURE RIM PRODUCTS SITE
OMMERCE TOWNSHIP, OAKLAND COUNTY, MICHIGAN
TDD: T05-9406-001
PAN: EMI1380SAA
DOCUMENT CONTROL NUMBER: TAT-05-23-0402**

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COMMERCE TOWNSHIP, OAKLAND COUNTY, MICHIGAN
TDD: T05-9406-001
PAN: EMI1380SAA
DOCUMENT CONTROL NUMBER: TAT-05-23-04025

August 25, 1994

Prepared for:

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EPA - Region V

Contract Number: 68-WO-0037

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Approved by: <u>Sandra L. Bahr</u>	Date: <u>8-25-94</u>



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1.0 INTRODUCTION

The Ecology and Environment, Inc. (E & E), Technical Assistance Team (TAT) was tasked by the United States Environmental Protection Agency (U.S. EPA) to conduct a site assessment at the Venture Rim Products site (VRP), under Technical Directive Document (TDD) number T05-9404-021. Tasks to be completed under this TDD included: compiling available information, preparing and implementing a health and safety plan, conducting a site inspection and air monitoring, evaluating threats posed by the site, providing photographic and written documentation, developing removal alternatives and costs, and assisting the On-Scene Coordinator (OSC) in preparation of an Action Memorandum. At the request of OSC Ralph Dollhopf, the TAT conducted site assessment activities at the VRP site on June 6, 1994.

2.0 BACKGROUND

2.1 Site Description

The VRP site is located 1.4 miles from the northeastern shore of Walled Lake, at 1080 Welch Road, Commerce Township, in Oakland County, Michigan (Figure 1). Its geographic coordinates are 42°32'33" north latitude and 83°27'25" west longitude. An abandoned, 34,500 square-foot, 1-story masonry structure dominates the 2.9-acre parcel. A paved parking area and storage building are also on the site. Land use in the surrounding area is mixed recreational, residential and light industrial. Homes nearest to the site are 0.25 mile southeast and northwest. A wetland is just 40 feet northeast (Figure 2). The Coe Railroad, a privately-owned entertainment line only, is parallel and immediately adjacent to the site's northwestern border. To the southwest is Welch Road and the GT Fasteners plant. No fence exists around the VRP property. Dense grasses grow along the eastern boundary.

All four major Pleistocene glacial stages advanced over the Michigan Basin, contributing to the structural down-warping of Pennsylvanian and Mississippian sandstones, shales, siltstones, and limestones. Prior to Pleistocene glaciation, the region was part of the Teays River system, which drained to [what is now called] the Hudson Valley. Clays left from glacio-fluvial processes led to poor drainage, extensive wetlands, and small lakes throughout lower Michigan.

2.2 Site History

Suburban to Detroit, Commerce Township and surrounding semi-rural communities have undergone much change since the late 1960s. Former agricultural tracts and wetlands have become areas of

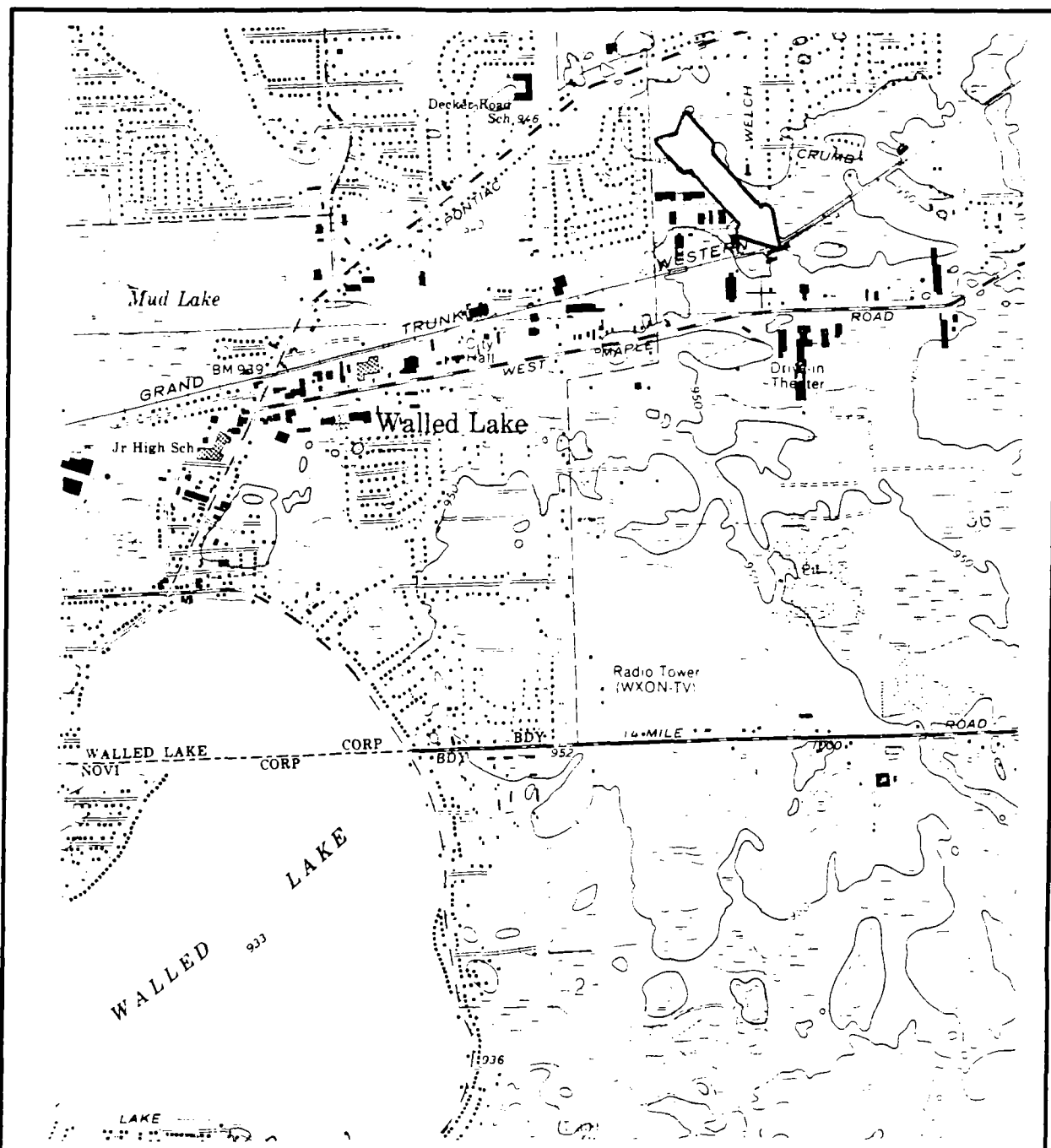


FIGURE 1

VENTURE RIM PRODUCTS SITE LOCATION

Commerce Township, Oakland County, Michigan

**U.S.G.S. 7.5-Minute Topographic
Quadrangle Map, Walled Lake, Michigan**

Scale 1:24,000



Walled Lake

PREPARED BY DATE
E.S. Landis 06/16/94

PAN# EM113805AA
T00# T059406001

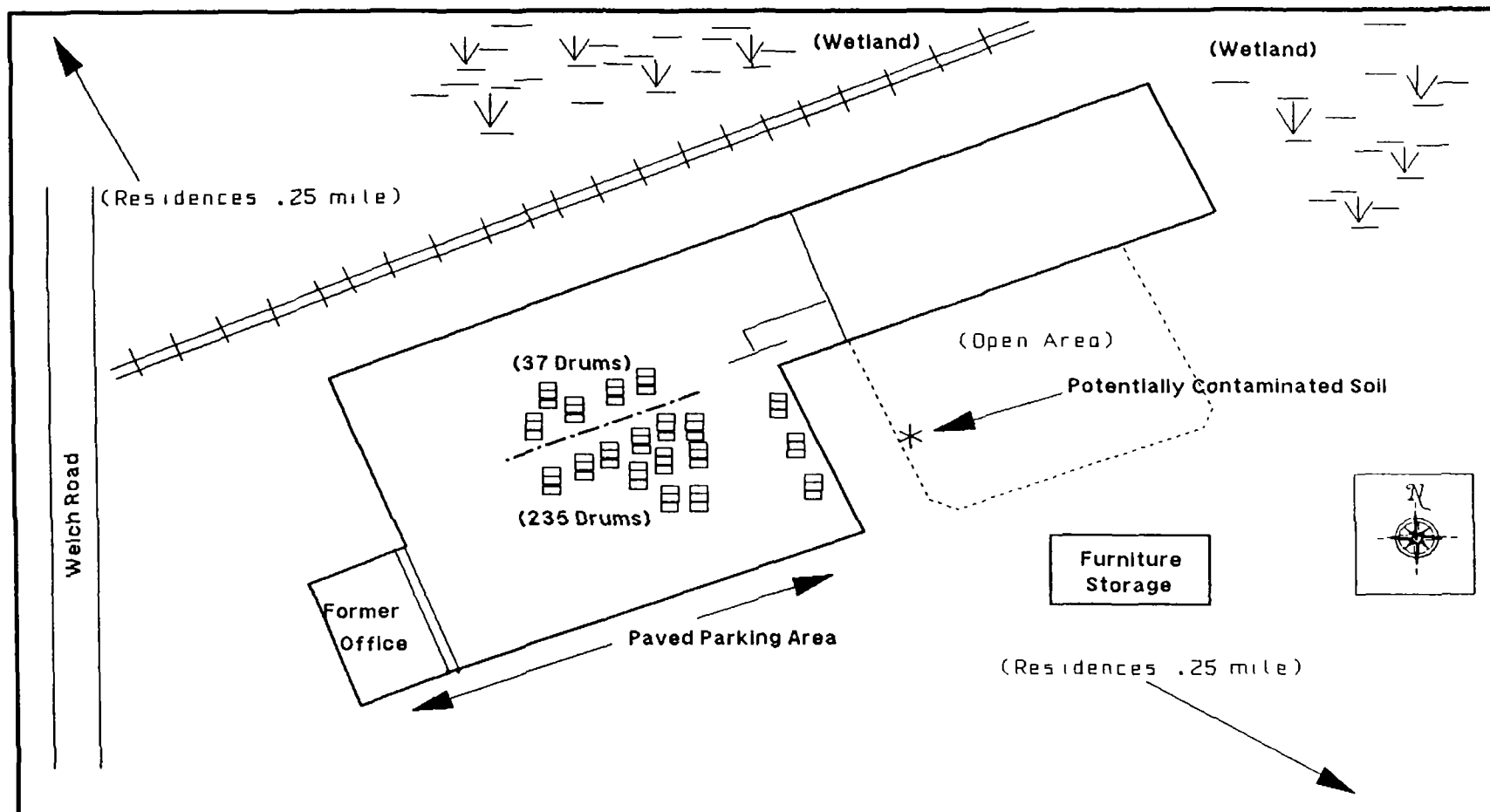


FIGURE 2

SITE FEATURES SCHEMATIC DRAWING VENTURE RIM PRODUCTS SITE

Commerce Township, Oakland County, Michigan

DRAWN BY
E.S. Landis

DATE
06/16/94

PAN #
EMI1380FAA

APPROVED BY
S.L. Basham

DATE
06/29/94

TDD #
T059406001

mixed residential, commercial, and industrial zones. The lakes continue to attract recreational boaters and vacationers.

The site is currently owned by Terry Collison and William Stocki. Mr. Stocki was the sole owner of the site prior to 1989; he operated a plastics injection-molding business called Rim Products. Some of the drums of polymer components on-site may have been left by the Rim Products company. In 1989, Rim Products was overtaken by Venture Rim Products, a manufacturer of injection-molded plastic bumpers for heavy vehicles. According to the Commerce Township Fire Chief, the building has been abandoned for about six years.

The Commerce Township Fire Department, under Chief Ronald Bolitho, had responded to an on-site fire on May 27, 1994, which destroyed the 1,600 square-foot office space at the site. Approximately 20 of 235 drums found in the adjacent warehouse were potentially exposed to high temperature caused by the fire. Another 37 empty drums were found staged in an adjacent room, apparently unaffected by the fire (Figure 2).

Representatives from the Michigan Department of Natural Resources (MDNR), Commerce Township officials, and an individual familiar with VRP's operations visited the site on May 27, 1994, after the fire was extinguished. Large quantities of spilled chemicals covered the floor, and many drums had leaked their contents. MDNR officials reported a detectable chemical odor. Several of the drums were bulging and had leaked large quantities of chemicals inside the building. MDNR representatives expressed concern about an apparent contaminant stain on the soil at the building's east side (Figure 2). MDNR funded the application of 15 to 20 cubic yards of sorbent material to mitigate the immediate release of the chemicals off site.

The VRP site was brought to the attention of the U.S. EPA's Office of Superfund, Emergency and Enforcement Response Branch (EERB) when Oladipo Oyinsan, Supervisor of the MDNR's Southeast District, requested EERB's assistance to mitigate threats posed by hazardous substances on-site. The drums, many of which were deteriorated and leaking, were fully accessible to humans and animals; therefore, U.S. EPA determined that an emergency response action was necessary.

3.0 SITE ACTIVITIES

3.1 Site Reconnaissance

On June 6, 1994, TAT members David Iacovone, Edward Lancaster, and Sandra Basham mobilized equipment and supplies to the site. They were met on site by OSC Ralph Dollhopf; MDNR

representatives, Richard Berak and Lars Mitchell; Commerce Township Fire Chief, Ron Bolitho, and his assistant; and site co-owner, William Stocki. Mr. Stocki stated that the drums of A and B polymer components had been stored on site pending sale. He also stated that each of the drums' contents had been sampled and positively identified in preparation for shipment.

U.S EPA and TAT personnel completed an on-site reconnaissance inside the VRP facility in level B protection. During that reconnaissance, TAT personnel conducted air monitoring with an HNu photoionization detector (PID), a combustible gas indicator and oxygen meter (CGI/O2), and a radiation meter. No readings above normal background were detected on the air monitoring equipment during the site reconnaissance inspection. The OSC and TAT re-entered the building in level C protection to make a drum inventory and to document site conditions (Attachment A). Approximately 235 drums were found in a large room, surrounded by large quantities of spilled chemicals and sorbent material.

3.2 Site Observations

The large concrete and corrugated-steel building on-site appeared to be 20 to 30 years old. Total floor space was 34,000 square feet, including 1,600 square feet of office space added on to the southwestern corner of the building. The office addition was attached to the warehouse by a breezeway, and was the portion destroyed by the May 27, 1994, fire. Other damage to the building's integrity, such as holes in the roof and walls, were unrelated to the fire.

The main building's southwestern interior was divided by a wall into two rooms. Approximately 280 drums of hazardous substances were found in these two rooms; many drums were damaged and leaking. Most drums carried labels stating that the contents were poly (oxyalkylene) polyol or methyl-diisocyanate (MDI). The building's northeast section contained some pieces of process equipment and debris. MDNR officials found an apparent contamination stain on soil in the open area at the building's southeastern quarter (Figure 2). Later inspections proved that contaminants had not flowed outside the building.

Evidence of trespass inside the building included property vandalism and signs of arson. Construction debris, dumped rubbish and home appliances on the property were evidence that trespassers had illegally used the site as a dump.

4.0 DISCUSSION OF POTENTIAL THREATS

The conditions at the Venture Rim Products site meet CERCLA criteria for a removal action as set forth in 40 CFR Section

300.415 (b) (2), which include, but are not limited to, the following:

- o Actual or potential exposure of nearby human populations, animals, or the food chain, to hazardous substances or pollutants or contaminants;

The site is in a mixed-use neighborhood, and because there is neither a fence around the property nor locks on the doors, leaking drums and spilth are fully accessible to animals and humans. Evidence of vandalism was found throughout the building. The drums contain substances known to be toxic upon inhalation, ingestion, and dermal contact.

- o Actual or potential contamination of drinking water supplies or sensitive ecosystems;

A wetland is immediately adjacent to and downgradient from the site and spill area. The proximity of surface water combined with leaking drums of hazardous chemicals in a completely unsecured building enhances the potential for contaminants to reach the wetland ecosystem.

- o Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

Approximately 280 drums of hazardous substances were found on site; many were damaged and leaking. MDI fumes are toxic, and the substance is a strong irritant. With heat, MDI will decompose to produce hydrocyanic acid. Polyol contains diphenylamine, which attacks fatty tissues.

- o High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;

During the MDNR's emergency response, sorbent material was spread on the building floor to prevent further migration of the spilled chemicals. The building is in such a state that spilled chemicals would easily migrate off site via rain water drainage or tracking by people and animals.

- o Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The warehouse is built of concrete and corrugated steel, but deteriorated, having large holes in the roof and some exterior walls. This lack of structural integrity exposes the drums to the weather, including rain, wind, and freeze-thaw cycles. Such conditions invite further degradation of the drums, and increase

the likelihood for the off-site migration of hazardous substances.

- o The availability of other appropriate federal or state response mechanisms to respond to the release;

Representatives from the MDNR evaluated the site conditions immediately after the fire emergency. After taking emergency response measures to mitigate the release, the MDNR requested the assistance of the U.S. EPA to clean up the site.

- o Other situations or factors that may pose threats to public health or welfare or the environment;

The cause of the May 27, 1994, fire was determined to be arson, and a suspect was arrested by Commerce Township police. Further heat damage to the drums by any future fires will only exacerbate the probability of a release of hazardous substances, particularly hydrocyanic acid.

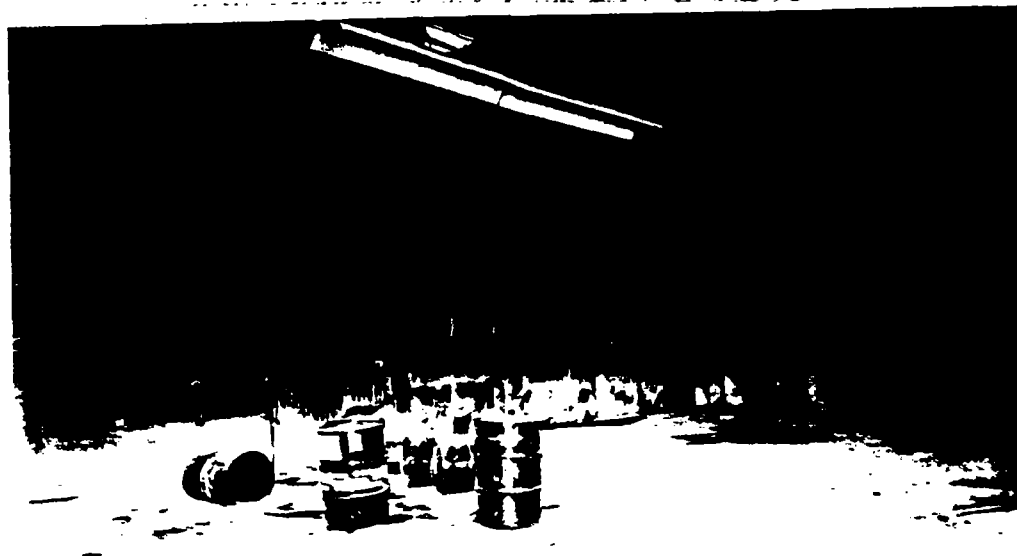
6.0 SUMMARY

The Venture Rim Products site consists of approximately 280 drums containing hazardous substances, stored in an unsecured and abandoned plant/warehouse. The drums were verified by the owner to contain methyl diisocyanate (MDI) and poly (oxyalkaline) polyol, components of high-polymer plastics. Both compounds are irritants; MDI is toxic by its production of hydrocyanic acid upon heating.

ATTACHMENT A
SITE PHOTOGRAPHS



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
DATE: 06.06.94 DIRECTION: NORTHEAST PHOTOGRAPHER: SLB
DESCRIPTION: DRUMS AT EAST END OF MAIN BUILDING.

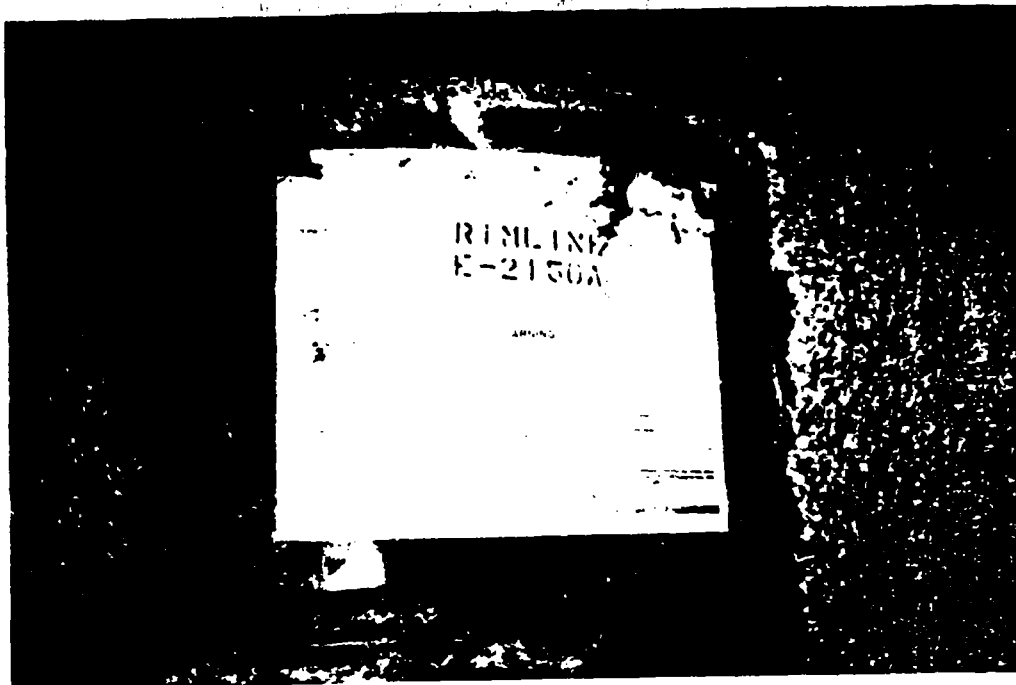




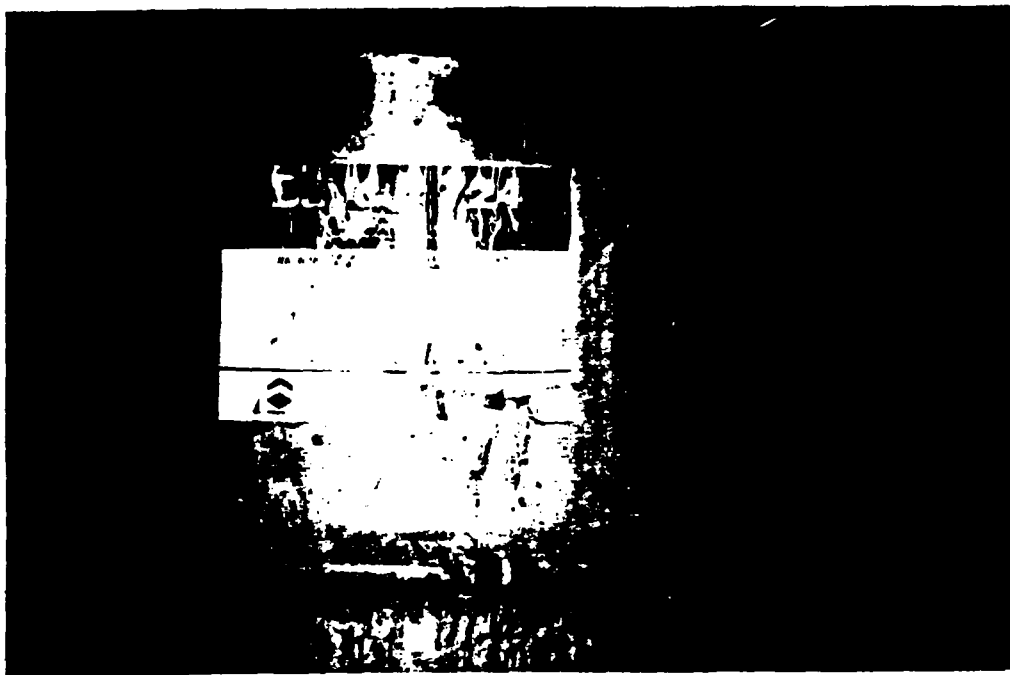
SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
 DATE: 06.06.94 DIRECTION: NORTHEAST PHOTOGRAPHER: SLB
 DESCRIPTION: DRUM AT EAST END OF MAIN BUILDING, SPLIT AND LEAKING.

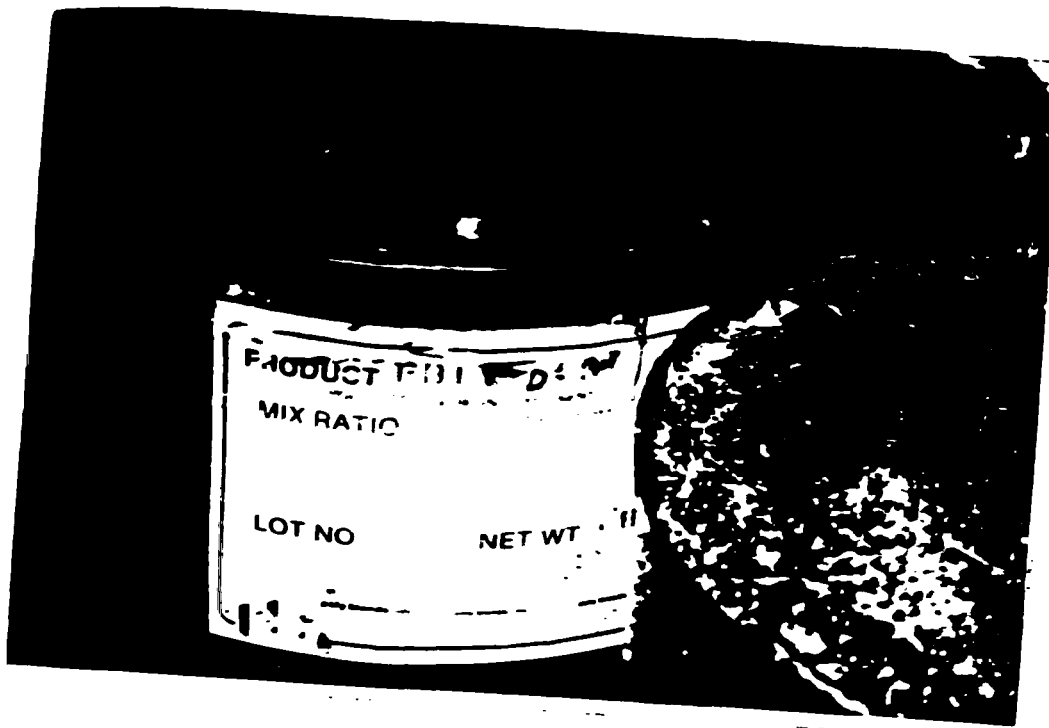


SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA

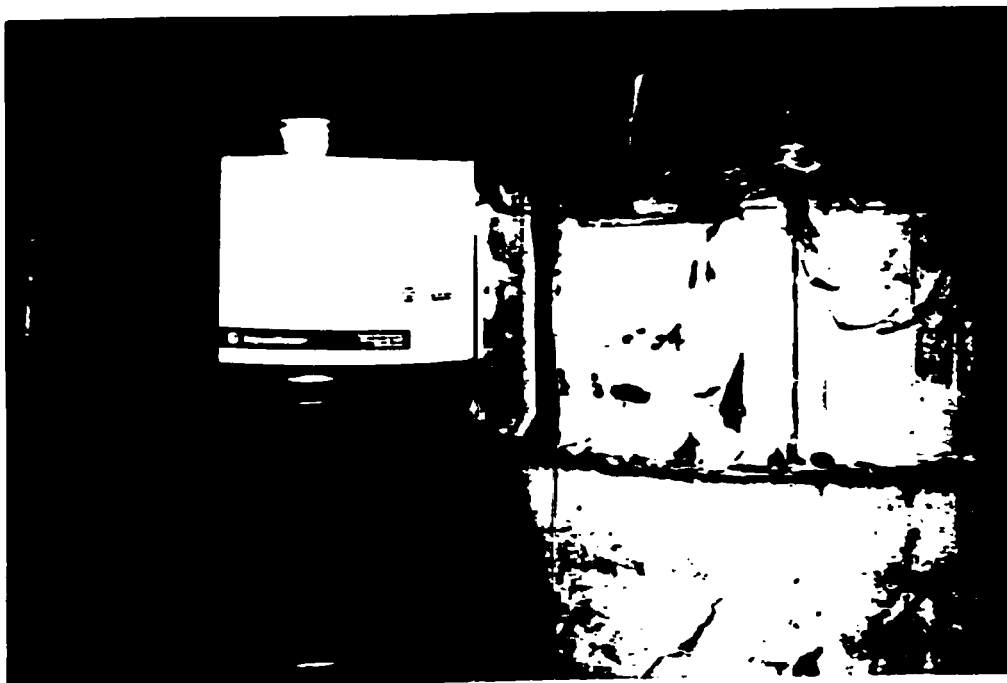


SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SA
DATE: 06.06.94 DIRECTION: PHOTOGRAPHER: SLB
DESCRIPTION: DRUM LABEL, "MODIFIED METHYLENE DIPHENYL
DIISOCYANATE".

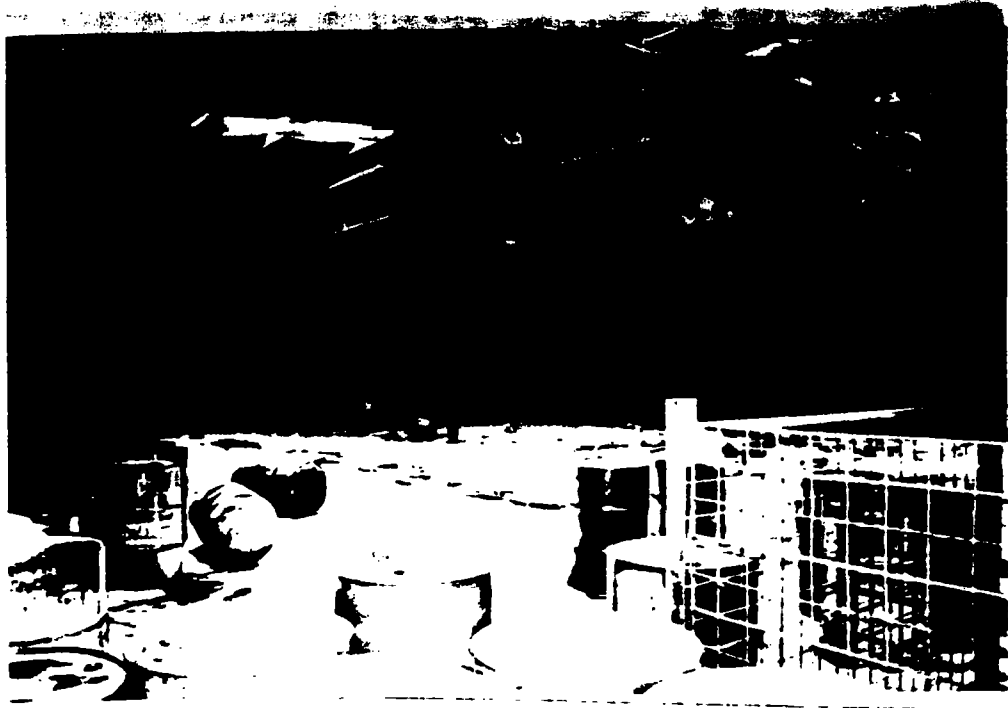




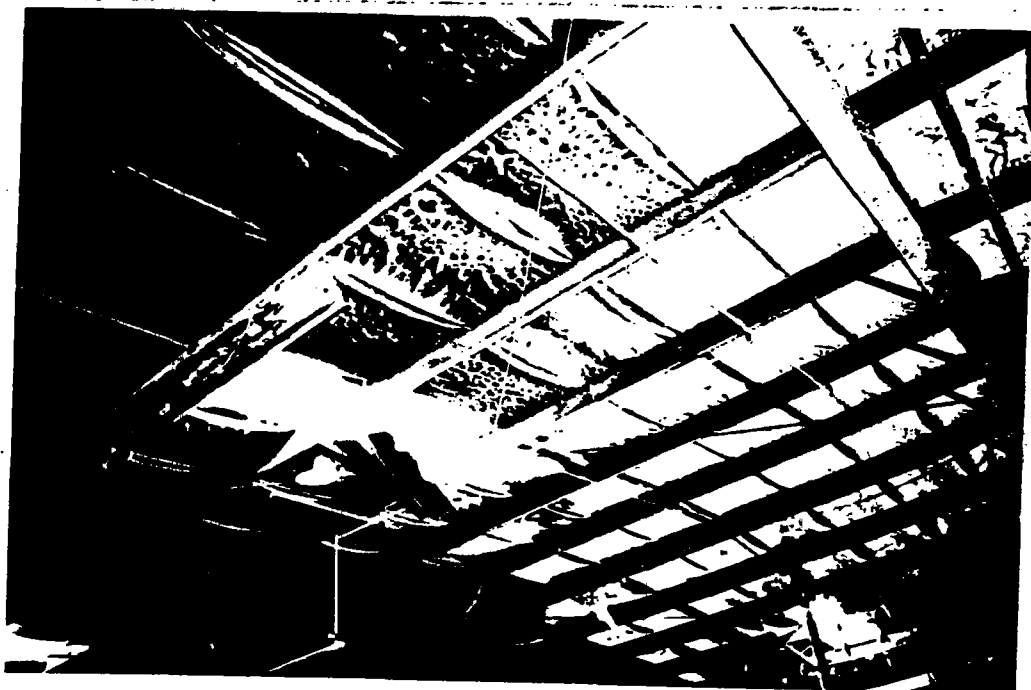
SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
 DATE: 06.06.94 DIRECTION: PHOTOGRAPHER: SLB
 DESCRIPTION: LABELS ON DRUMS IN GROUP OF 37 (MDI).



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
DATE: 06.06.94 DIRECTION: PHOTOGRAPHER: SLB
DESCRIPTION: SORB-ALL ON FLOOR OF MAIN ROOM.

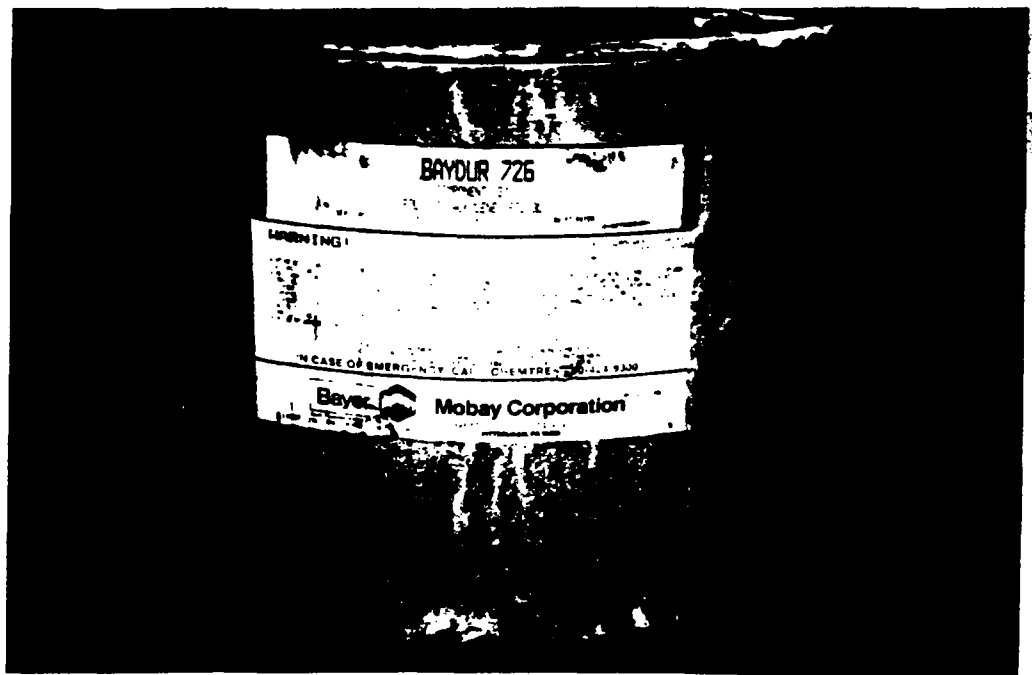




SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
DATE: 06.06.94 DIRECTION: SOUTHEAST PHOTOGRAPHER: SLB
DESCRIPTION: GROUP OF 37 DRUMS ALONG SOUTHEAST WALL OF SMALLER ROOM.



VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
DATE: 06.06.94 DIRECTION: PHOTOGRAPHER: SLB
DESCRIPTION: LABEL ON LEAKING DRUM AT THE NORTHEAST LOADING
BAY/OVERHEAD DOOR.



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
 DATE: 06.06.94 DIRECTION: PHOTOGRAPHER: SLB
 DESCRIPTION: SPILTH AROUND DRUM OF POLYOL.



TDD: T059406001

PAN: EMI1380SAA



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
DATE: 06.06.94 DIRECTION: SOUTHWEST PHOTOGRAPHER: SLB
DESCRIPTION: VIEW OF DRUMS, FIRE AREA IN BACKGROUND.



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA



SITE: VENTURE RIM PRODUCTS TDD: T059406001 PAN: EMI1380SAA
DATE: 06.06.94 DIRECTION: PHOTOGRAPHER: SLB
DESCRIPTION: EVIDENCE OF TRESPASS: TAR-LIKE SUBSTANCE APPARENTLY
SPREAD ON FLOOR WITH A BROOM.

